

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

R’KES STARLING, individually and behalf of
all others similarly situated,

Plaintiff,

v.

PR ADVISORS, LLC, D/B/A PINNACLE
REALTY ADVISORS and RAM
PROPERTIES, LLC,

Defendants.

Case No. 1:24-cv-00991-DII

**DEFENDANT PR ADVISORS, LLC’S UNOPPOSED MOTION FOR AN EXTENSION
OF TIME TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

Defendant PR Advisors, LLC, d/b/a Pinnacle Realty Advisors (“Defendant”), by and through its undersigned counsel, respectfully submits this **unopposed** motion for an extension of time to file a Reply in Support of Defendant’s Motion to Dismiss (*see* Dkt. 11, “Motion to Dismiss”; Dkt. 21, “Plaintiff’s Response in Opposition to Motion to Dismiss”) in the above-referenced matter **to and including January 29, 2025**, and states as follows:

1. Defendant filed its Motion to Dismiss in this matter on November 26, 2024. *See* Dkt. 11.

2. Plaintiff filed his Response to Defendant’s Motion to Dismiss on January 8, 2025, *see* Dkt. 21, pursuant to the 28-day extension of time permitted by the Court’s December 12, 2024, Order.

3. Defendant and its counsel seek and are in need of an extension of time as to Defendant’s reply filing deadline of January 15, 2025. *See* Local Rule CV-7(e). Defendant’s counsel have several unmovable professional and personal scheduling conflicts with the current deadline, which make completing the foregoing tasks by the current deadline extraordinarily

difficult. Further, Plaintiff filed a lengthy response in opposition to the Motion to Dismiss after receiving a lengthy extension to do so. *See* Dkt. 20 & 21. Thus, Defendant needs additional time to prepare and submit its reply for the Court's consideration.

4. Given the foregoing, Defendant seeks a modest 14-day extension of time, to and including January 29, 2025, to file a reply in support of its Motion to Dismiss.

5. On January 8, 2025, counsel for Defendant conferred with counsel for Plaintiff, Andrew Perrong, regarding this Motion prior to its filing, who confirmed in writing the same day that Plaintiff has no objection to and does not oppose the requested extension.

6. Good cause exists for granting Defendant's request for at least the reasons above.

7. The foregoing request is not being made for the purpose of delay. Since this matter is in its early stages, the requested extension will not result in any prejudice nor impact the timely resolution of this case.

8. A proposed order has been provided herewith for the Court's consideration.

WHEREFORE, Defendant respectfully requests this Court enter the proposed order, or a substantially similar order, (i) granting Defendant an extension of time to file a reply in support of its Motion to Dismiss in this action **to and including January 29, 2025**; and (ii) granting all other relief the Court deems just and proper.

Dated: January 9, 2025

Respectfully submitted,

By: /s/ Leoncio A. Gil, III

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**ATTORNEYS FOR DEFENDANT
PR ADVISORS, LLC**

CERTIFICATE OF SERVICE

I certify that on, January 9, 2025, a true and correct copy of the foregoing document was electronically filed with the Court's ECF system to be sent via the electronic notification system to all counsel of record in the above-captioned matter.

By: /s/ Leoncio A. Gil, III
LEONCIO A. GIL, III